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Attorneys for Defendant Motorola
Inc.

Attorney for Plaintiff Gregory Bender

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

Gregory Bender,

Plaintiff,

v.

Motorola Inc.,

Defendant.

CASE NO. C 09-01245 SBA

**STIPULATION AND [PROPOSED]
ORDER REGARDING DEADLINE
FOR INVALIDITY CONTENTIONS**

Plaintiff Gregory Bender ("Plaintiff") and Defendant Motorola Inc, ("Defendant"),
through their respective counsel, hereby make the following stipulation with regards to
Defendant's invalidity contentions.

WHEREAS, Plaintiff served his infringement contentions on March 12, 2010.

WHEREAS, on March 19, 2010, Defendant informed Plaintiff that Defendant believes the
infringement contentions do not comply with Patent L.R. 3-1, that Defendant intends to seek
Court resolution of this issue including a stay of Defendant's invalidity contention and document
production obligations, and that Defendant requests a meet and confer between the parties to
discuss the issue.

WHEREAS, the parties have agreed to stay Defendant's invalidity contention and
document production obligations pending the resolution of this matter.

1 THE PARTIES HEREBY STIPULATE THAT:

2 Defendant's obligations under Patent L.R. 3-3 and 3-4 and any other obligations to
3 produce technical documents shall be stayed until 45 days after the resolution of the parties'
4 dispute regarding the sufficiency of Plaintiff's infringement contentions.

5 Respectfully submitted,

6 Dated: March 26, 2010

Jones Day

8 By: /s/ Greg L. Lippetz

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13 Counsel for Defendant Nokia Inc.

14 In accordance with General Order No. 45, Section X(B), the above signatory attests that
15 concurrence in the filing of this document has been obtained from the signatory below.

17 Dated: March 26, 2010

18 By: /s/ David N. Kuhn

19 David N. Kuhn
20 Attorney-at-Law
21 144 Hagar Avenue
22 Piedmont, California 94611
23 Telephone: (510) 653-4983

21 Counsel for Plaintiff Gregory Bender

22 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**

25 DATED: 3/31/10

26 By: 
27 THE HON. SAUNDRA B. ARMSTRONG
28 United States District Court Judge